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Attorneys for Defendants, Deptford Township, Deptford Township Police Department, Deptford Township Internal Affairs Department, Police Chief Kevin Pancoast, Sergeant Michael Riggs, Detective Matthew J. Massing and Officer Ryan Osmola

<p><i>Plaintiff(s),</i> ANNETTE CHINN, DOUGLAS CHINN and CHELSEY CHINN</p> <p>vs.</p> <p><i>Defendant(s),</i> DENYCE CHINN; DONEAN PARKER; DEPTFORD TOWNSHIP; DEPTFORD TOWNSHIP POLICE DEPARTMENT; DEPTFORD TOWNSHIP INTERNAL AFFAIRS DEPARTMENT; POLICE CHIEF KEVIN PANCOAST; SERGEANT MICHAEL RIGGS; DETECTIVE MATTHEW J. MASSING; OFFICER RYAN OSMOLA; GLOUCESTER COUNTY PROSECUTOR'S OFFICE; PROSECUTOR CHARLES FIORE; ASSISTANT PROSECUTOR PAUL COLANGELO; INDIVIDUAL OFFICERS 1-5; INDIVIDUAL ASSISTANT PROSECUTORS 1-5</p>	<p>UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY</p> <p><u>CIVIL ACTION</u></p> <p>CASE NO. 1:20-cv-10256-NLH-JS</p> <p>NOTICE OF MOTION TO DISMISS PLAINTIFF'S COMPLAINT FOR FAILURE TO ANSWER DISCOVERY PURSUANT TO LOCAL RULE 37.1</p>
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TO: Joseph P. Howard, Esq.

TAKE NOTICE that the undersigned will apply to the above-named Court located in Camden, New Jersey on a date to be determined by the Court, or as soon thereafter as counsel may be heard, for an Order dismissing plaintiff's Complaint for failure to provide Rule 26 Disclosures upon the following grounds:

Reliance will be placed upon the attached Certification.

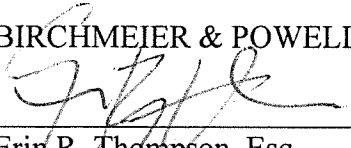
A proposed form of Order is attached.

Pursuant to *Rule 1:6-2(d)*, the undersigned:

- Waives oral argument and consents to disposition on the papers.
- Requests oral argument if Motion is contested.**
- Requests oral argument.
- Oral argument is not requested at this time.

BIRCHMEIER & POWELL LLC

BY:


Erin R. Thompson, Esq.

Attorney for Defendants, Deptford Township, Deptford Township Police Department, Deptford Township Internal Affairs Department, Police Chief Kevin Pancoast, Sergeant Michael Riggs, Detective Matthew J. Massing and Officer Ryan Osmola

Date: January 12, 2021